

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

H.R.H. PRINCE FAISAL BIN KHALID BIN
ABDULAZIZ AL SAUD,

Plaintiff,

-against-

PIA INVESTMENTS LIMITED, PAKISTAN
INTERNATIONAL AIRLINES CORPORATION,

Defendants.

07 Civ. 5603 (NRB)(HBP)

**NOTICE OF MOTION
TO COMPEL ARBITRATION
OR TO DISMISS THE
COMPLAINT**

PLEASE TAKE NOTICE that, upon the annexed declaration of Donald I Strauber, dated June 27, 2007, and the exhibits thereto, the annexed declaration of Rashid S. Farookee, dated June 27, 2007, the annexed declaration of Ali Safdar Rezvi, dated June 28, 2007, and upon all the prior pleadings and proceeding herein, Defendants PIA Investments Limited and Pakistan International Airlines Corporation, (collectively, "Defendants,") will move this Court before the Honorable Naomi Reice Buchwald, U.S.D.J., at the United States Courthouse located at 500 Pearl Street, New York, New York on July 25, 2007, at 9:30 a.m., or as soon thereafter as counsel may be heard, for an order:

1) Pursuant to 9 U.S.C. § 206 and Rule 12(b)(1) of the Federal Rules of Civil Procedure, compelling arbitration of the claims in the Complaint; or

2) In the alternative, dismissing the Complaint on the ground of *forum non conveniens*;

and for such other and further relief as the Court deems just and proper.

June 28, 2007

CHADBOURNE & PARKE LLP

By: /s Donald I Strauber

Donald I Strauber (DS-9256)

A Member of the Firm

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